



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

OFFICE OF DISTRICT COUNSEL

MEMORANDUM

DATE: January 6, 1998
TO: Fred Lettice, Sr. Air Quality Engineering Manager
FROM: Frances L. Keeler, Sr. Deputy District Counsel /s/ Frances
SUBJECT: Interpretation of Rule 1107; Applicability to Stripping Operations

This is a written confirmation of my advice provided earlier regarding the applicability of Rule 1107 to stripping operations which are not engaged in the subsequent coating of metal parts. As you and I discussed, stripping operations are not listed in the applicability section of Rule 1107 and thus, the rule apparently does not apply.

A review of past staff reports does not provide support for including stripping operations in the rule. In fact, calculation for emissions reductions from the rule clearly indicate that only those stripping operations which are part of a coating facility were contemplated. Thus we conclude that facilities which are solely engaged in the stripping of coatings for metal parts and do not subsequently coat parts, are not subject to the provisions of Rule 1107.

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